

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Ocean Semiconductor LLC,

Plaintiff

v.

MediaTek Inc. and MediaTek USA Inc.
("MediaTek"),

Defendants.

Civil Action No.: 6:20-cv-1210-ADA

JURY TRIAL DEMANDED

PATENT CASE

Ocean Semiconductor LLC,

Plaintiff

v.

NXP USA, Inc.

Defendants.

Civil Action No.: 6:20-cv-1212-ADA

JURY TRIAL DEMANDED

PATENT CASE

Ocean Semiconductor LLC,

Plaintiff

v.

Silicon Laboratories Inc.,

Defendant.

Civil Action No.: 6:20-cv-1214-ADA

JURY TRIAL DEMANDED

PATENT CASE

Ocean Semiconductor LLC,
Plaintiff

v.

STMicroelectronics, Inc.,
Defendant.

Civil Action No.: 6:20-cv-1215-ADA

JURY TRIAL DEMANDED

PATENT CASE

Ocean Semiconductor LLC,
Plaintiff

v.

Western Digital Technologies, Inc.
Defendant.

Civil Action No.: 6:20-cv-1216-ADA

JURY TRIAL DEMANDED

PATENT CASE

**DECLARATION OF HENRIK D. PARKER IN SUPPORT OF PLAINTIFF
OCEAN SEMICONDUCTOR LLC'S RESPONSE IN OPPOSITION TO
DEFENDANTS' OPPOSED MOTION TO MODIFY SCHEDULING ORDER**

I, Henrik D. Parker, Esq., declare as follows:

1. I am Counsel at the Devlin Law Firm LLC. I am currently in good standing and licensed to practice in the State of Pennsylvania and a member of the bar of this Court.

2. I am counsel of record for Plaintiff Ocean Semiconductor LLC, ("Ocean") in the above captioned actions, and make this Declaration in support of Ocean's contemporaneously-filed Response in Opposition to Defendants' Opposed Motion to Modify Scheduling Order.

3. The facts set forth herein are true to my personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

4. Attached as Exhibit 1 to this Declaration is a true and correct copy of Defendant STMicroelectronics, Inc.'s First Set of Interrogatories to Ocean Semiconductor LLC, dated December 16, 2021.

5. Attached as Exhibit 2 to this Declaration is a true and correct copy of Defendant STMicroelectronics, Inc.'s First Set of Requests for Production to Ocean Semiconductor LLC, dated December 16, 2021.

6. Attached as Exhibit 3 to this Declaration is a true and correct copy of Defendant Western Digital Technologies, Inc.'s Second Set of Interrogatories to Ocean Semiconductor LLC, dated March 25, 2022.

7. Attached as Exhibit 4 to this Declaration is a true and correct copy of Defendant Western Digital Technologies, Inc.'s Second Set of Requests for Production to Ocean Semiconductor LLC, dated March 25, 2022.

8. Attached as Exhibit 5 to this Declaration is a true and correct copy of a letter sent by counsel for STMicroelectronics, Inc. to counsel for Ocean regarding what Defendants refer to as alleged "deficiencies" in Ocean's Preliminary Infringement Contentions ("PICs"), dated August 11, 2021.

9. Attached as Exhibit 6 to this Declaration is a true and correct copy of a second letter sent by counsel for STMicroelectronics, Inc. to counsel for Ocean regarding what Defendants refer to as alleged "deficiencies" in Ocean's PICs, dated October 26, 2021.

10. Attached as Exhibit 7 to this Declaration is a true and correct copy of a third letter sent by counsel for STMicroelectronics, Inc. to counsel for Ocean regarding what Defendants refer to as alleged "deficiencies" in Ocean's PICs, dated February 15, 2022.

11. Attached as Exhibit 8 to this Declaration is a true and correct copy of a letter sent by counsel for Ocean to counsel for STMicroelectronics, Inc. in response to Defendants' first letter regarding what Defendants refer to as alleged "deficiencies" in Ocean's PICs, dated September 8, 2021.

12. Attached as Exhibit 9 to this Declaration is a true and correct copy of a letter sent by counsel for Ocean to counsel for STMicroelectronics, Inc. in response to Defendants' second letter regarding what Defendants refer to as alleged "deficiencies" in Ocean's PICs, dated December 13, 2021.

13. Attached as Exhibit 10 to this Declaration is a true and correct copy of an email chain between Henrick Parker, counsel for Ocean, counsel for Defendants, and Erik Puknys, counsel for ASML US, LLC and ASML US, LP ("ASML"), dated between January 25, 2022 and April 5, 2022.

14. Attached as Exhibit 11 to this Declaration is a true and correct copy of a subpoena served by Defendant STMicroelectronics, Inc. on Advanced Micro Devices, Inc. ("AMD") for testimony and the production of documents, dated December 20, 2021.

15. Attached as Exhibit 12 to this Declaration is a true and correct copy of a subpoena served by Defendant STMicroelectronics, Inc. on Taiwan Semiconductor Manufacturing Company, Inc. ("TSMC") for testimony and the production of documents, dated March 11, 2022.

16. Attached as Exhibit 13 to this Declaration is a true and correct copy of a subpoena served by Defendant STMicroelectronics, Inc. on United Microelectronics Corporation ("UMC") for testimony and the production of documents, dated March 11, 2022.

17. Attached as Exhibit 14 to this Declaration is a true and correct copy of an email chain between counsel for Ocean and counsel for Defendants, dated between April 4, 2022 and April 13, 2022.

I declare under penalty of perjury under the laws of the United States that to the best of my knowledge and recollection the foregoing is true and correct.

Executed this 20th day of April, 2022.

/s/ Henrik D. Parker
Henrik D. Parker

CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Henrik D. Parker
Henrik D. Parker